

FRANCIS O. SCARPULLA (41059)
 CRAIG C. CORBITT (83251)
 PAMELA E. WOODSIDE (226212)
 TRAVISS L. GALLOWAY (234678)
 QIANWEI FU (242669)
 ZELLE, HOFMANN, VOELBEL, MASON & GETTE LLP
 44 Montgomery Street, Suite 3400
 San Francisco, CA 94104
 Telephone: (415) 693-0700
 Facsimile: (415) 693-0770
 fscarpulla@zelle.com
 ccorbitt@zelle.com

*Interim Lead and Liaison Counsel for
 Indirect Purchaser Class*

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

IN RE STATIC RANDOM ACCESS
 MEMORY (SRAM) ANTITRUST
 LITIGATION

Case No. M:07-CV-01819-CW

MDL No. 1819

This Document Relates to:
 INDIRECT PURCHASER PLAINTIFFS

**CORRECTED STIPULATION AND
 ORDER TO ADD INDIRECT
 PURCHASER PLAINTIFFS FOR
 FLORIDA, THE DISTRICT OF
 COLUMBIA AND UTAH AND TO ADD A
 CLAIM UNDER THE UTAH
 ANTITRUST ACT TO THE INDIRECT
 PURCHASER PLAINTIFFS' THIRD
 CONSOLIDATED AMENDED
 COMPLAINT**

WHEREAS, on June 12, the Honorable Claudia Wilken, directed the parties to meet and confer regarding the addition of new plaintiffs (as well as other matters regarding individual state claims) to the Indirect Purchaser Plaintiffs' Third Consolidated Amended Class Action Complaint;

WHEREAS, Indirect Purchaser Plaintiffs and Defendants have now met in good faith and agreed to stipulate to the addition of plaintiffs representing the states of Florida, Utah and the District of Columbia; and agreed to stipulate to the addition of an antitrust claim for the state of Utah;

CORRECTED STIPULATION AND [PROPOSED] ORDER TO ADD PLAINTIFFS
 AND CLAIM TO THIRD CONSOLIDATED AMENDED COMPLAINT

1 NOW THEREFORE, the Indirect Purchaser Plaintiffs and Defendants stipulate and
2 agree to the amendment of the Indirect Purchaser Plaintiffs' Third Consolidated Amended
3 Complaint to add allegations as follows:

4 1. Plaintiff Dona Culver is a resident of the District of Columbia who indirectly
5 purchased SRAM manufactured and/or sold by one or more of the Defendants or their co-
6 conspirators during the Class Period, primarily for personal, family and household use, and
7 was injured as a result of Defendants' illegal conduct;

8 2. Plaintiff John Pharr d/b/a JP Micro is a resident of Florida who indirectly
9 purchased SRAM manufactured and/or sold by one or more of the Defendants or their co-
10 conspirators during the Class Period, for end use and not for resale, and was injured as a
11 result of Defendants' illegal conduct;

12 3. Plaintiff Aaron Stobbe is a resident of Utah who indirectly purchased SRAM
13 manufactured and/or sold by one or more of the Defendants or their co-conspirators during
14 the Class Period, for end use and not for resale, and was injured as a result of Defendants'
15 illegal conduct;

16 4. Plaintiff Chris Giauque is a resident of Utah who indirectly purchased SRAM
17 manufactured and/or sold by one or more of the Defendants or their co-conspirators during
18 the Class Period, for end use and not for resale, and was injured as a result of Defendants'
19 illegal conduct; and

20 5. Indirect Purchaser Plaintiffs shall add an antitrust claim under Utah law,
21 section 76-10-919 *et seq.*

22 6. Inasmuch as the Utah claims are new, defendants shall have the right to
23 challenge the Utah claims by a motion to dismiss or other pleading.

24 Dated: August 1, 2008

ZELLE, HOFMAN, VOLBEL, MASON
& GETTE LLP

26 By: /s/ Pamela E. Woodside
Pamela E. Woodside

27 *Interim Lead Counsel for Indirect*
28 *Purchaser Class*

1 Dated: August 1, 2008

THELEN, REID, BROWN, RAYSMAN
& STEINER LLP

2
3 By: /s/ Paul R. Griffin
Paul R. Griffin

4 *Liaison Counsel for Defendants*

5
6 PURSUANT TO STIPULATION, IT IS SO ORDERED.

7
8 Dated: August __5__, 2008



Hon. Claudia Wilken

9
10 *United States District Judge*
Northern District of California

ATTESTATION OF FILING

Pursuant to N.D. Cal. General Order No. 45, section 45 X(B), I, Pamela E. Woodside, hereby attest that concurrence in the filing of this stipulation and proposed order has been obtained from: Liaison Counsel for Defendants who have provided the conformed signatures above.

ZELLE, HOFMAN, VOLBEL, MASON
& GETTE LLP

By: /s/ Pamela E. Woodside
Pamela E. Woodside

Document # 3213957v2

IN RE STATIC RANDOM ACCESS MEMORY (SRAM) ANTITRUST LITIGATION
Case No. M:07-cv-01819-CW
MDL No. 1819

CERTIFICATE OF SERVICE

I, Rita Mehler, certify and declare under penalty of perjury that I: am a citizen of the United States; am over the age of 18 years; am employed by Zelle, Hofmann, Voelbel, Mason & Gette LLP, at the address indicated, whose members are members of the State Bar of California and at least one of whose members is a member of the Bar of each Federal District Court within California; am not a party to or interested in the cause entitled upon the document to which this Proof of Service is affixed; and that I served a true and correct copy of the following document(s) in the manner indicated below:

**CORRECTED STIPULATION AND [PROPOSED] ORDER TO ADD
INDIRECT PURCHASER PLAINTIFFS FOR FLORIDA, THE DISTRICT OF
COLUMBIA AND UTAH AND TO ADD A CLAIM UNDER THE UTAH
ANTITRUST ACT TO THE INDIRECT PURCHASER PLAINTIFFS' THIRD
CONSOLIDATED AMENDED COMPLAINT**

- ☐ by today depositing, at San Francisco, California, the said document(s) in the United States mail in a sealed envelope, with first-class postage thereon fully prepaid; (and/or)
- ☐ by facsimile transmission to the parties listed below;
- ☐ by overnight mail to the parties listed below;
- ☐ by today personally delivering the said document(s) to the person(s) indicated below in a manner provided by law, by handing them the documents or by leaving the said document(s) at the office(s) or usual place(s) of business, during usual business hours, of the said person(s) with a clerk or other person who was apparently in charge thereof and at least 18 years of age, whom I informed of the contents.
- ☐ (BY ELECTRONIC MAIL) I caused such document(s) to be emailed to the offices and/or to attorneys of offices of the above named addressee(s).
- ☒ **By USDC Live System-Documents Filing System:** on all interested parties registered for e-filing.

Dated: August 1, 2008

Signed /s/ Rita Mehler
Rita Mehler